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MICROSOFT CORPORATION

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

MICROSOFT CORPORATION,
Plaintiff and Counterclaim
Defendant,

vs.

COREL CORPORATION
Defendant

and

COREL INC.
Defendant and Counterclaim
Plaintiff.

Case No. 5:15-cv-05836-EJD

**JOINT STIPULATION AND
[PROPOSED] ORDER IN RESPONSE TO
DECEMBER 11, 2017 COURT ORDER
REQUESTING REDACTIONS**

Ctrm: 4, 5th Floor

Judge: Hon. Edward J. Davila

1 In response to the Court's Order of December 11, 2017 (Dkt. No. 216), Plaintiff Microsoft
2 Corporation ("Microsoft") and Defendants Corel Corporation and Corel, Inc. (collectively, "Corel")
3 have met and conferred about whether the Court's recent orders (Dkt. Nos. 213-15) should be
4 redacted. The parties have agreed and are submitting the attached redacted version of the Order
5 granting Microsoft's motion for partial summary judgment (Dkt. No. 214). The redacted portions of
6 the Order should be sealed for the reasons set forth in the Declaration of Domingo M. Llagostera In
7 Support of Corel's Administrative Motion to File Documents Under Seal, ¶¶ 4-5 (Dkt. No. 187-1).
8 The parties' request is narrowly tailored to seal only information that has been designated
9 confidential pursuant to the Protective Order.

10 The parties have further agreed that the Order granting Corel's motion to exclude opinions of
11 Microsoft's damages expert (Dkt. No. 213) and the Order denying Corel's motion for leave to file a
12 motion for summary judgment (Dkt. No. 215) require no redactions and may be unsealed in their
13 entirety. Accordingly, IT IS HEREBY STIPULATED:

- 14 (1) That the Order granting Microsoft's motion for partial summary judgment (Dkt No. 214)
15 will remain sealed and the Court will publicly issue the redacted version of that order
16 submitted herewith;
- 17 (2) That the Order granting Corel's motion to exclude opinions of Microsoft's damages
18 expert (Dkt. No. 213) requires no redactions and can be unsealed; and
- 19 (3) That the Order denying Corel's motion for leave to file a motion for summary judgment
20 (Dkt. No. 215) requires no redactions and can be unsealed.

21 DATED: December 15, 2017

BLANK ROME LLP

23 By: /s/Megan R. Wood
24 Megan R. Wood

25 Attorney for Defendants
26 COREL CORPORATION and COREL INC.
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1 DATED: December 15, 2017

FISH & RICHARDSON

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3 By: /s/ Jonathan Lamberson

Jonathan Lamberson

4 Attorney for Plaintiff

5 MICROSOFT CORPORATION

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7 **FILER'S ATTESTATION**

8 Pursuant to Civil L.R. 5-1(i)(3), I attest that concurrence in the filing of the document has been
9 obtained from the other Signatory.

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11 /s/Megan R. Wood

12 Megan R. Wood

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2017

Edward J. Davila
UNITED STATES DISTRICT JUDGE